



Jeanne E. Noonan  
757.625.1192  
[jnoonan@ventkerlaw.com](mailto:jnoonan@ventkerlaw.com)

April 25, 2017

**VIA U.S.P.S. and Email**

E. Stanley Murphy, Esq.  
Dunton, Simmons & Dunton, L.L.P.  
678 Rappahannock Drive  
White Stone, VA 22578

Re: FE Partners, LLC and Fomento Resources USA (LLC) v. Chesapeake Boat Works, LLC, Chesapeake Marine Railway, LLC, Jonathan M. Farinholt, and Richard L. Farinholt, II, *in personam*, and Motor Yacht SEQUOIA, *in rem*; Civil Action No. 4:16cv188

Dear Stan:

I appreciate you meeting with me last week. As you know, we represent FE Partners, LLC and Fomento Resources USA (LLC) in the above referenced matter, and we have filed suit in the United States District Court against Chesapeake Boat Works, et al. ("CBW"). As discussed, our litigation is in the discovery phase, and we would like to obtain certain information from the Deagle family, as Deagle's Marine Railway, Inc. and the Deagle family own the underlying property and lease the yard and marine railways – where SEQUOIA is presently stranded – to CBW.

To that end, we are looking for the following:

- a. Any and all documents related to both marine railways, including any improvements made to the railways, and information pertaining to the rating and down-rating of the railways. This includes any form of correspondence, plans, reports, permits, invoices, or any other document.
- b. We are also looking for all communications with the Farinholt family or anyone at CBW regarding the shipyard, the railways, or the M/Y SEQUOIA. Specifically, we are looking for information about the capacity of the railways and all information about the railways provided to CBW.

To simplify this process, we are willing to avoid the imposition and burden of filing a subpoena duces tecum. Instead, we can be available at any time to come to your office or any location convenient to you or the Deagle family to inspect any documents they can provide, and will copy them at our own cost.

Page 2

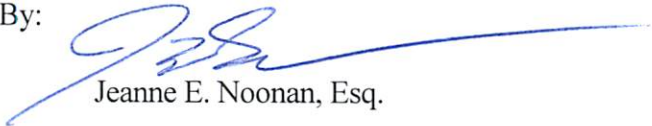
April 25, 2017

We are most appreciative of the assistance of the Deagle family and its concern for SEQUOIA, and we look forward to working with both you and the Deagle family. Should you have any questions or concerns, please do not hesitate to contact us.

Very truly yours,

VENTKER HENDERSON, PLLC

By:

A handwritten signature in blue ink, appearing to read 'J. Noonan', with a long horizontal flourish extending to the right.

Jeanne E. Noonan, Esq.

JEN/

---

**From:** Stan Murphy <esmurphy@DSDLAW.COM>  
**Sent:** Tuesday, June 27, 2017 5:33 PM  
**To:** Jeanne E. Noonan  
**Subject:** RE: Spoliation Letter

Thanks, Jeanne. They are just now climbing out of the dark clouds. I was able to speak with Becky today for the first time. I will get you an answer this week.

Stan

---

**From:** Jeanne E. Noonan [mailto:jnoonan@ventkerlaw.com]  
**Sent:** Tuesday, June 27, 2017 2:55 PM  
**To:** Stan Murphy <esmurphy@DSDLAW.COM>  
**Cc:** David N. Ventker <dventker@ventkerlaw.com>; Marissa M. Henderson <mhenderson@ventkerlaw.com>  
**Subject:** RE: Spoliation Letter

Stan,

Following up on the below e-mail, and we also wanted to touch base with you regarding our previous correspondence about obtaining information from the Deagle family. We understand that Captain Deagle sadly passed away last month.

As you know, we would like to be as sensitive to the needs of his family as possible, but would very much like to inspect any documents, communications, and photographs they may have about the railways. We are happy to drive up to Irvington or Deltaville, and will copy the documents at our own expense at a time that is convenient for everyone. However, we are now dealing with discovery deadlines, and time is a factor for us.

Please feel free to give us a call to discuss.

Best,  
Jeanne

*Jeanne E. Noonan, Esq.*

Associate

**Ventker Henderson, PLLC**  
**256 West Freemason Street**  
**Norfolk, VA 23510**

phone: 757.625.1192

direct: 757.321.9583

fax: 757.625.1475

web: [www.ventkerlaw.com](http://www.ventkerlaw.com)



**From:** Jeanne E. Noonan  
**Sent:** Friday, July 21, 2017 10:35 AM  
**To:** E. Murphy  
**Cc:** David N. Ventker; Marissa M. Henderson  
**Subject:** Sequoia and Deagle family documents

Stan,

Following up on our conversations from last week – I am headed back to Deltaville on Thursday, July 27<sup>th</sup>, for another inspection at CBW.

I wanted to touch base with you to see if you had the opportunity to speak with Becky regarding the documents, photographs, etc. we discussed previously. As I will be in the area, it would be great to catch up again.

Best,  
Jeanne

*Jeanne E. Noonan, Esq.*

Associate

**Ventker Henderson, PLLC**  
**256 West Freemason Street**  
**Norfolk, VA 23510**

phone: 757.625.1192

direct: 757.321.9583

fax: 757.625.1475

web: [www.ventkerlaw.com](http://www.ventkerlaw.com)



---

**From:** Jeanne E. Noonan  
**Sent:** Wednesday, July 26, 2017 3:22 PM  
**To:** E. Murphy  
**Cc:** David N. Ventker; Marissa M. Henderson  
**Subject:** RE: Sequoia and Deagle family documents

Hi Stan,

We haven't heard from you, but are reaching out to see if there is a way to obtain the documents and other items identified in our letter to you dated April 25<sup>th</sup>, 2017.

While we understand the sensitive nature of the situation, we have a scheduling order in place from the federal court and discovery deadlines are looming. We would prefer not to issue a subpoena, but rather to work with you to obtain the documents in a way that is convenient for Ms. Lengua.

Again, I will be in the area tomorrow, and if you would like to discuss this in person please let me know.

Best,  
Jeanne

*Jeanne E. Noonan, Esq.*

Associate

**Ventker Henderson, PLLC**  
**256 West Freemason Street**  
**Norfolk, VA 23510**

phone: 757.625.1192

direct: 757.321.9583

fax: 757.625.1475

web: [www.ventkerlaw.com](http://www.ventkerlaw.com)



---

**From:** Jeanne E. Noonan  
**Sent:** Friday, July 21, 2017 10:35 AM  
**To:** E. Murphy <esmurphy@dsdlaw.com>  
**Cc:** David N. Ventker <dventker@ventkerlaw.com>; Marissa M. Henderson <mhenderson@ventkerlaw.com>  
**Subject:** Sequoia and Deagle family documents

Stan,

Following up on our conversations from last week – I am headed back to Deltaville on Thursday, July 27<sup>th</sup>, for another inspection at CBW.

I wanted to touch base with you to see if you had the opportunity to speak with Becky regarding the documents, photographs, etc. we discussed previously. As I will be in the area, it would be great to catch up again.

Best,  
Jeanne

*Jeanne E. Noonan, Esq.*

Associate

**Ventker Henderson, PLLC**  
**256 West Freemason Street**  
**Norfolk, VA 23510**

phone: 757.625.1192

direct: 757.321.9583

fax: 757.625.1475

web: [www.ventkerlaw.com](http://www.ventkerlaw.com)

